

**IN THE UNITED STATES DISTRICT COURT FOR THE  
EASTERN DISTRICT OF VIRGINIA  
ALEXANDRIA DIVISION**

<b>AMAZON.COM, INC and AMAZON DATA SERVICES, INC.,</b>	)	
	)	<b>Case No. 1:20cv484</b>
Plaintiffs,	)	
	)	<b>Hon. Rossie D. Alston, Jr.</b>
v.	)	<b>Hon. Theresa Buchanan</b>
	)	
<b>WDC HOLDINGS LLC d/b/a NORTHSTAR COMMERCIA PARTNERS, et al,</b>	)	
	)	
Defendants,	)	
	)	<b>NELSON DEFENDANTS’ UNOPPOSED MOTION FOR INDEPENDENT APPEARANCE OF FOREIGN ATTORNEY</b>
<b>800 HOYT LLC,</b>	)	
	)	
Intervening Interpleader Plaintiff,	)	
	)	
v.	)	
	)	
<b>BRIAN WATSON, et al.,</b>	)	
	)	
Interpleader Defendants.	)	
	)	

Defendants Carleton Nelson and Cheshire Ventures, LLC (“Nelson Defendants”) respectfully file this Unopposed Motion for Independent Appearance of Foreign Attorney, and, in so doing, respectfully state the following:

1. The Nelson Defendants respectfully request that their *pro ha vice* admitted counsel, Adam Smart, be permitted to attend the Friday, August 12, 2022 Motion Hearing (Dkt. 903) without aid of local counsel.

2. Pursuant to Local Rule 83.1(D)(1)(b), local counsel is required to attend all hearings with foreign counsel admitted *pro hac vice*.

3. The Nelson Defendants' local counsel, Rachel Friedman, has an unavoidable travel related conflict out of the country and cannot travel for and is unable to attend the hearing remotely on Friday. For this reason, the Nelson Defendants respectfully request that Ms. Friedman be excused from attendance and Mr. Smart be granted the limited ability to appear independently of her for the August 12, 2022 Motion Hearing only.

4. No party to the motion objects to Mr. Smart's limited independent appearance.

WHEREFORE, for the reasons detailed above, the Nelson Defendants respectfully request that the Court permit counsel Adam Smart to attend the August 12, 2022 Motion Hearing independent of local counsel.

Dated: August 10, 2022

**BURR & FORMAN LLP**

/s/ Rachel Friedman

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/s/ Adam R. Smart

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*Attorneys for Carleton Nelson and Cheshire Ventures LLC*

**CERTIFICATE OF SERVICE**

I hereby certify that on the August 10, 2022, a true and correct copy of the foregoing has been served via email on the following:

Casey Kirschner  
635 N. Alvarado Lane  
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By email: casey.kirschner@gmail.com

/s/ Rachel Friedman